

AO 91 (Rev. 08/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Middle District of Pennsylvania

United States of America  
v.  
Yankin Jiang and Hanlin Yang

Case No. 5:24 MJ 17

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 2023 to present in the county of Centre, Luzerne, elsewhere in the  
Middle District of Pennsylvania, the defendant(s) violated:

## Code Section

18 U.S.C. Section 1349  
Conspiracy to Commit Wire Fraud

## Offense Description

On or about and between August 2023 and the present, in Centre, Luzerne and Clinton Counties, and elsewhere, the defendants, did knowingly, intentionally and unlawfully conspire with each other, and with others known and unknown, to commit the crime of wire fraud, in violation of 18 U.S.C. Section 1349.

This criminal complaint is based on these facts:

See Attached Affidavit of Probable Cause

FILED  
WILKES BARRE

FEB 21 2024

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DEPUTY CLERK☒ Continued on the attached sheet.

Tyler Matthew  
Complainant's signature

Special Agent Tyler Matthew, HSI  
Printed name and title

Sworn to before me and signed <sup>by reliable</sup> ~~in my presence~~ <sup>electronic means.</sup>

Date: Feb. 21, 2024City and state: Wilkes-Barre, PA

Joseph F. Saporito, Jr.  
Judge's signature

Joseph F. Saporito, Jr. Chief U.S. Magistrate Judge  
Printed name and title